

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2009-479-W/S

IN RE:)
)
Application of United Utility Companies,)
Inc. for adjustment of rates and charges)
and modification of certain terms and)
conditions for the provision of water and)
sewer service.)
_____)

**MEMORANDUM IN OPPOSITION TO APPLICANT'S
REQUEST FOR APPROVAL OF BOND**

North Greenville University ("NGU"), intervenor in the above-referenced matter, would respectfully show unto the Public Service Commission (the "Commission") that United Utility Companies, Inc.'s ("United Utility") Request for Approval of Bond should be denied.

United Utility requests that the Commission approve a bond in the amount of \$311,426.00 pursuant to S.C. Code Ann. § 58-5-240(D). Section 58-5-240(D) vests the Commission with determining the "reasonable amount" of the bond. North Greenville respectfully asserts that, based on the outstanding issues discussed in the Commission's Order denying United Utility's application, there is no bond amount which is reasonable in this case. In the event the Commission believes that it is obligated under § 58-5-240(D) to set a reasonable bond amount, North Greenville respectfully submits that a reasonable bond should be far in excess of \$311,426.00, as requested by United Utility, in order to ensure that the customers' interests are adequately protected. North Greenville proposes a bond in the amount of \$467,139.00, which represents three times the annual difference between the revenue which

would be generated by UUC's currently approved rates and the rates resulting from ORS's proposed accounting adjustments and recommended ROE in this matter and accepting the assumption of Order 2010-375 that 11% of UUC's served premises are occupied but not being billed.

Respectfully submitted,

s/ William H. Jordan
Duke K. McCall, Jr.
William H. Jordan
Smith Moore Leatherwood LLP
300 East McBee Avenue, PO Box 87
Greenville, SC 29602-0087
(864) 242-6440
(864) 240-2474 (Fax)

Attorneys for North Greenville University

August 3, 2010